

SOUTHERN ENVIRONMENTAL LAW CENTER

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March 1, 2012

VIA ELECTRONIC FILING

Jocelyn Boyd, Esquire
Chief Clerk
South Carolina Public Service Commission
PO Drawer 11649
Columbia, SC 29211

RE: In the Matter of South Carolina Electric & Gas Company's Annual Update
on Demand Side Management Programs and Petition for an Update to
Rate Rider
Docket No. 2012-55-E

Dear Ms. Boyd:

Enclosed for filing in the referenced docket is the Petition to Intervene of the South Carolina Coastal Conservation League and Southern Alliance for Clean Energy. By copy of this letter, I am serving all parties of record on the service list. Please contact me if you have any questions.

Sincerely,

/s/ J. Blanding Holman, IV
J. Blanding Holman, IV

Enclosures
cc: Parties of Record

STATE OF SOUTH CAROLINA

(Caption of Case)

South Carolina Electric & Gas Company's Annual
Update on Demand Side Management Programs for
Petition for an Update to Rate Rider

BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

COVER SHEET

DOCKET

NUMBER: 2012 - 55 - E

(Please type or print)

Submitted by: J. Blanding Holman

SC Bar Number: 72260

Address: Southern Environmental Law Center

Telephone: (843) 720-5270

43 Broad St. - Suite 300

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Charleston, SC 29401

Other:

Email: bholman@selc.org

NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

DOCKETING INFORMATION (Check all that apply)

☐ Emergency Relief demanded in petition ☐ Request for item to be placed on Commission's Agenda expeditiously

☐ Other:

INDUSTRY (Check one)	NATURE OF ACTION (Check all that apply)			
<input checked="" type="checkbox"/> Electric	<input type="checkbox"/> Affidavit	<input type="checkbox"/> Letter	<input type="checkbox"/> Request	
<input type="checkbox"/> Electric/Gas	<input type="checkbox"/> Agreement	<input type="checkbox"/> Memorandum	<input type="checkbox"/> Request for Certification	
<input type="checkbox"/> Electric/Telecommunications	<input type="checkbox"/> Answer	<input type="checkbox"/> Motion	<input type="checkbox"/> Request for Investigation	
<input type="checkbox"/> Electric/Water	<input type="checkbox"/> Appellate Review	<input type="checkbox"/> Objection	<input type="checkbox"/> Resale Agreement	
<input type="checkbox"/> Electric/Water/Telecom.	<input type="checkbox"/> Application	<input type="checkbox"/> Petition	<input type="checkbox"/> Resale Amendment	
<input type="checkbox"/> Electric/Water/Sewer	<input type="checkbox"/> Brief	<input type="checkbox"/> Petition for Reconsideration	<input type="checkbox"/> Reservation Letter	
<input type="checkbox"/> Gas	<input type="checkbox"/> Certificate	<input type="checkbox"/> Petition for Rulemaking	<input type="checkbox"/> Response	
<input type="checkbox"/> Railroad	<input type="checkbox"/> Comments	<input type="checkbox"/> Petition for Rule to Show Cause	<input type="checkbox"/> Response to Discovery	
<input type="checkbox"/> Sewer	<input type="checkbox"/> Complaint	<input checked="" type="checkbox"/> Petition to Intervene	<input type="checkbox"/> Return to Petition	
<input type="checkbox"/> Telecommunications	<input type="checkbox"/> Consent Order	<input type="checkbox"/> Petition to Intervene Out of Time	<input type="checkbox"/> Stipulation	
<input type="checkbox"/> Transportation	<input type="checkbox"/> Discovery	<input type="checkbox"/> Prefiled Testimony	<input type="checkbox"/> Subpoena	
<input type="checkbox"/> Water	<input type="checkbox"/> Exhibit	<input type="checkbox"/> Promotion	<input type="checkbox"/> Tariff	
<input type="checkbox"/> Water/Sewer	<input type="checkbox"/> Expedited Consideration	<input type="checkbox"/> Proposed Order	<input type="checkbox"/> Other:	
<input type="checkbox"/> Administrative Matter	<input type="checkbox"/> Interconnection Agreement	<input type="checkbox"/> Protest		
<input type="checkbox"/> Other:	<input type="checkbox"/> Interconnection Amendment	<input type="checkbox"/> Publisher's Affidavit		
	<input type="checkbox"/> Late-Filed Exhibit	<input type="checkbox"/> Report		

STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION

DOCKET NO. 2012-55-E

In the Matter of:)	
)	
)	
South Carolina Electric & Gas)	
Company's Annual Update on)	PETITION TO INTERVENE
Demand Side Management)	
Programs and Petition for an Update)	
to Rate Rider)	
)	
)	
)	

Southern Alliance for Clean Energy and the South Carolina Coastal Conservation League (collectively, "Petitioners") hereby petition the South Carolina Public Service Commission ("Commission") to intervene in the above-captioned docket pursuant to R.103-825 of the Commission's rules. In support of this petition, Petitioners state as follows:

1. On January 31, 2012, South Carolina Electric & Gas Company ("SCE&G") filed an Annual Update on Demand Side Management Programs and Petition for an Update to Rate Rider. In its filing, SCE&G (i) submits to the Commission for review, information concerning the status of SCE&G's demand reduction and energy efficiency ("DSM") programs, and (ii) petitions the Commission for authorization to update its Rider to Retail Rates – Demand Side Management Component" to provide for the recovery of SCE&G's costs, lost net margin revenue, and shared savings incentive associated with its DSM programs. SCE&G requests that the updated rider become effective for bills rendered on and after the first billing cycle of May 2012.

2. The South Carolina Coastal Conservation League (“CCL”) is a nonprofit corporation organized under the laws of the State of South Carolina. The principal address of CCL is P.O. Box 1765, Charleston, South Carolina 29402. As an advocate for conservation and energy efficiency, CCL supports the development of energy policy that is in the public interest of South Carolinians. CCL has members in South Carolina who receive electricity service from SCE&G.

3. Southern Alliance for Clean Energy (“SACE”) is a nonprofit organization whose mission is to promote responsible energy choices that create global warming solutions and ensure clean, safe and healthy communities throughout the Southeast. SACE’s principal address is P.O. Box 1842, Knoxville, Tennessee 37901. SACE also has offices in Florida, Georgia, North Carolina and South Carolina. SACE has members who receive electricity service from SCE&G, and SACE and its members are interested in promoting greater reliance on conservation and energy efficiency to meet South Carolina’s energy needs.

4. Petitioners seek to intervene in this proceeding to ensure that their members’ interests in promoting energy savings through energy efficiency are represented.

5. Petitioners do not seek a hearing in this proceeding. Petitioners plan to present their position in the form of written comments to be filed by April 1, 2012, or by such other date as established by the Commission.

6. Petitioners are represented by the following counsel in this proceeding:

J. Blanding Holman, IV
Southern Environmental Law Center
43 Broad St., Suite 300
Charleston, SC 29401

Telephone: (843) 720-5270
Fax: (843) 720-5240

WHEREFORE, Petitioners pray that they be allowed to intervene in this matter.

Respectfully submitted this 1st day of March, 2012.

s/ J. Blanding Holman, IV
SC Bar No. 72260
Southern Environmental Law Center
43 Broad St., Suite 300
Charleston, SC 29401
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*Attorney for Petitioners South Carolina
Coastal Conservation League and
Southern Alliance for Clean Energy*

CERTIFICATE OF SERVICE

I hereby certify that the parties listed below have been served via first class U.S. Mail with a copy of the Petition to Intervene of the South Carolina Coastal Conservation League and Southern Alliance for Clean Energy.

Florence P. Belser
Office of Regulatory Staff
1401 Main Street, Suite 900
Columbia, SC 29201

K. Chad Burgess
South Carolina Electric & Gas Company/SCANA Corporation
MC C222
220 Operation Way
Cayce, SC 29033-3701

This 1st day of March, 2012.

s/ J. Blanding Holman, IV
J. Blanding Holman, IV